

**United States Environmental Protection Agency  
Region 6  
1201 Elm Street, Suite 500  
Dallas, Texas 75270-2102**

**ADMINISTRATIVE RECORD INDEX  
FOR  
BULLDOG ENVIRONMENTAL SERVICES SITE,  
ANTON, HOCKLEY COUNTY, TEXAS**

**CERCLIS NO: TXN000622179  
SSID NUMBER: A6TS**

**Contract No.  
Contract No. EP-S5-17-01  
Task Order No. 5**

**Prepared by:  
ARS Aleut Remediation LLC  
and Toeroek Associates**

**DATED: February 28, 2023**

## INTRODUCTION

The “Administrative Record” is the collection of documents which form the basis for the U. S. Environmental Protection Agency’s (EPA) selection of a response action at a Superfund site. Superfund is the name given to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) which can be found in Title 42 of the U.S. Code (U.S.C.) at Sections 9601 through 9675. Response actions under Superfund can be either “removal actions” or “remedial actions.” This Administrative Record involves a removal action. As the EPA decides what to do at the site of a release of hazardous substances, the EPA compiles documents concerning the site and the EPA’s decision into an “Administrative Record File.” Documents may be added to the “Administrative Record File” from time to time. Once the EPA Regional Administrator or the Regional Administrator’s delegate signs the Action Memorandum memorializing the selection of the removal action, the documents which form the basis for the selection of the removal action are known as the “Administrative Record.”

The Administrative Record will be available for public review during normal business hours in an electronic computer imaged format at the Environmental Protection Agency (EPA), Region 6 office which is located at the address given below; also at the Texas Commission on Environmental Quality (TCEQ), 12100 Park 35 Circle, Austin, Texas 78753, the Lamb County Library, 110 E. 6<sup>th</sup> Street, Littlefield, Texas 79339 and the George & Helen Mahon Public Library, 1306 9<sup>th</sup> St, Lubbock, Texas 79401. The Administrative Record is treated as a non-circulating reference document. Individuals may review documents contained in the Administrative Record, according to the procedures at the EPA, Region 6 and the (TCEQ) offices and at the local repository (Lamb County Library and the George & Helen Mahon Public Library) located near the Site. The Administrative Record will be maintained at the local repository until further notice. The EPA may send additional documents to the repository as work progresses at the Site.

The EPA may hold formal public comment periods at certain stages of the response process. The public is urged to use the formal public comment periods to submit written comments to the EPA regarding the removal at the Site. However, the EPA welcomes written comments at any time. Please send all comments to:

Removal Administrative Record Coordinator (SEDEC)  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 500  
Dallas, TX 75270-2102

Except as explained below, this index and the record were compiled in accordance with the EPA’s Revised Guidance on Compiling Administrative Records for CERCLA Response Actions, EPA/OSRE/OEM/OSRTI (September 20, 2010), and in accordance with Superfund Removal Procedures Public Participation Guidance for On-Scene Coordinators: Community Relations and the Administrative Record, OSWER 9360.3-05 (July 1992), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.

Consistent with 40 CFR Sections 300.805 (a) (2), and 300.810 (a) (2), Region 6 has listed, in the Administrative Record Index (or in bibliographies of documents listed in the Index), guidance documents which may form a basis for the selection of this response action (EPA Guidance Documents, Non-Site Specific). Unless the guidance documents indexed were generated specifically for the Site, the guidance documents may not be present in the Administrative Record. However, it should be noted that the EPA does maintain an extensive collection of Superfund response action guidance documents

available in electronic format on the EPA website at <https://www.epa.gov/superfund/superfund-policy-guidance-and-laws>. Additionally, the EPA guidance related to Superfund cleanup enforcement may be found on the website at the following address: <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund>. This page is titled, "Superfund Cleanup Policies and Guidance".

Documents listed as bibliographic sources for other documents in the record might not be listed separately in the Site Index. When a document is listed in the Site Index but not located among the documents that the EPA has made available in the repository, the EPA will, upon request, include the document in the repository. This applies to verified sampling data, chain of custody forms, and guidance and policy documents. It does not apply to documents in the EPA's "Confidential File." Requests for such documents should be addressed to the Removal Administrative Record Coordinator at the address listed above.

**Administrative Record, Removal Action**  
**EPA Guidance Documents, Non-Site Specific**

Title: Quality Assurance/Quality Control Guidance for Removal Activities  
Sampling QA/QC Plan and Data Validation Procedures: Interim Final

Date of Publication: April 1990

Document #:

OSWER: 9360.4-01

EPA: EPA/540/G-90/004

NTIS: PB90-274481

Title: Superfund Removal Procedures: Action Memorandum Guidance

Date of Publication: September 2009

Document #:

OSWER: 9360.3-01

EPA: EPA/540/P-90/004

NTIS: PB90-274473

Title: Revised Guidance on Compiling Administrative Records for CERCLA Response Actions

Date of Publication: September 20, 2010

Document #:

OSWER: not available

EPA: not available

NTIS: not available

Title: Superfund Removal Procedures: Guidance on the Consideration of ARARS During Removal Actions

Date of Publication: September 1991

Document #:

OSWER: 9360.3-02

EPA: EPA/540/P-91/011

NTIS: PB92-963401

Title: Superfund Removal Procedures: Removal Enforcement Guidance for On-Scene Coordinators

Date of Publication: April 1992

Document #:

OSWER: 9360.3-06

EPA: not available

NTIS: PB92-963409

Title: Superfund Removal Procedures: Public Participation Guidance for On-Scene Coordinators:  
Community Relations and the Administrative Record

Date of Publication: July 1992

Document #

OSWER: 9360.3-05

EPA: not available

NTIS: PB92-963416

Title: Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA

Date of Publication: August, 1993

Document #:

OSWER: 9360.0-32

EPA: EPA/540/R-93/057

NTIS: PB93-963402

Title: Superfund Removal Procedures: Removal Response Reporting: POLREPs and OSC Reports

Date of Publication: June 1994

Document #:

OSWER: 9360.3-03

EPA: EPA/540/R-94/023

NTIS: PB93-963421

Title: Superfund Removal Procedures: Response Management, Start-up to Close-out

Date of Publication: September 1996

Document #

OSWER: 9360.03-04

EPA: EPA/540/R-96/039

NTIS: PB96.963407

Title: Superfund Removal Procedures: State Participation in Federal-Lead Removal Actions

Date of Publication: December 1996

Document #

OSWER: 9360.03-07

EPA: EPA/540/R-96/041

NTIS: PB96.963409

Title: Superfund Removal Procedures: Special Circumstances

Date of Publication: January 1998

Document #

OSWER: 9360.03-09

EPA: EPA/540/R-96/041

NTIS: PB96.963409

Title: Superfund Removal Procedures: The Removal Response Decision: Site Discovery to Response Decision

Date of Publication: June 1998

Document #

OSWER: 9360.03-08

EPA: EPA/540/R-96/038

NTIS: PB96.963406

## **National Service Center for Environmental Publications and Information (NSCEPI)**

Clearinghouse for EPA documents which are still in print. You can order up to five documents at a time for free plus no postage. Search the catalog online at:

<http://www.epa.gov/ncepihom/>

### **or call:**

1-800-490-9198 to order from an operator (Note: need to have EPA document # or exact title.)

## **National Technical Information Center (NTIS)**

Fee-based archive of government documents, including EPA. Costs vary according to the document. Some are available in fiche only. This clearinghouse has older documents which are no longer in print at NSCEPI. Search the catalog online at:

<http://www.ntis.gov>

### **or call:**

Sales Desk – 1-800-553-6847 or (703) 605-6000 8 a.m. – 6 p.m.; EST, Mon-Fri

Fax (703) 605-6900

## COMMONLY USED ACRONYMS

<b>ADEQ</b>	Arkansas Department of Environmental Quality
<b>ATSDR</b>	Agency for Toxic Substances and Disease Registry
<b>CDC</b>	Centers for Disease Control and Prevention
<b>CERCLA</b>	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
<b>EPA</b>	United States Environmental Protection Agency
<b>RPB</b>	Response and Prevention Branch, EPA Region 6
<b>ERRS</b>	Emergency and Rapid Response Services (EPA Contractor)
<b>LDEQ</b>	Louisiana Department of Environmental Quality
<b>NCP</b>	National Oil and Hazardous Substances Pollution Contingency Plan
<b>NFRAP</b>	No Further Remedial Action Planned
<b>NMED</b>	New Mexico Environment Department
<b>NPL</b>	National Priorities List
<b>OPA</b>	Oil Pollution Act of 1990
<b>OSC</b>	Federal On-Scene Coordinator
<b>ODEQ</b>	Oklahoma Department of Environmental Quality
<b>OSHA</b>	Occupational Safety and Health Administration
<b>POLREP</b>	Pollution Report
<b>PRP</b>	Potentially Responsible Party
<b>RCRA</b>	Resource Conservation and Recovery Act of 1976
<b>SARA</b>	Superfund Amendment and Reauthorization Act of 1986
<b>START</b>	Superfund Technical Assessment and Response Team (EPA Contractor)
<b>TCEQ</b>	Texas Commission on Environmental Quality

REMOVAL ACTION  
ADMINISTRATIVE RECORD FILE INDEX  
02/28/2023  
REGION ID: 06  
SITE NAME: BULLDOG ENVIRONMENTAL SERVICES  
CERCLIS ID: TXN000622179  
SSID: A6TS

DOCID	DOC_DATE	PAGE_COUNT	TITLE	ACCESS_CODE	ADDRESSEE	AUTHOR	DOC_TYPE	Document Bates Begin	Document Bates End
100028376	07/19/2019	40	ENFORCEMENT ACTION REFERRAL AND TCEQ INVESTIGATION REPORT FOR BULLDOG ENVIRONMENTAL SERVICES LLC SITE - INVESTIGATION NO. 1577738 CONDUCTED 04/25/2019 -05/25/2019	UCTL(Uncontrolled)	R06: None (NONE SPECIFIED)	R06: Adams, Jason (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY), R06: Keith, Jay (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY)	RPT / Report	000001	000040
100028374	02/24/2020	16	TCEQ INVESTIGATION REPORT FOR BULLDOG ENVIRONMENTAL ANTON UNA SITE - INVESTIGATION NO. 1623279 - CONDUCTED 01/09/2020 - 01/09/2020	UCTL(Uncontrolled)	R06: None (NONE SPECIFIED)	R06: Adams, Jason (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY)	RPT / Report	000041	000056
100028447	12/01/2020	23	[REDACTED] TARGET SHEET FOR PLEASE REVIEW EMAIL SENT FROM FIRE CHIEF OF LEVELLAND AND DISCUSSION OF FIELD ANALYSIS AT THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Bernier, Roberto, L (U.S. ENVIRONMENTAL PROTECTION AGENCY)	R06: Lamb, Jonathan (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000057	000057
100028384	12/11/2020	2	WASTE PROFILING FOR THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Scott, Ricky (SCOTT MANUFACTURING INCORPORATED)	R06: Bernier, Roberto (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000058	000059
100028389	12/31/2020	5	START TIME FOR PROCESSING 142 DRUMS AT THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Scott, Ricky (SCOTT MANUFACTURING INCORPORATED)	R06: Bernier, Robert (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000060	000064
100028385	01/08/2021	7	WASTE REMOVAL/ DISPOSAL FOR THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Scott, Ricky (SCOTT MANUFACTURING INCORPORATED)	R06: Bernier, Roberto (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000065	000071
100028448	03/22/2021	6	[REDACTED] TARGET SHEET FOR DRUMS D1-D6 WERE REMOVED FROM THE SITE ON 03/19/2021 - THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Bernier, Roberto, L (U.S. ENVIRONMENTAL PROTECTION AGENCY)	R06: Lamb, Jonathan (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000072	000072



REMOVAL ACTION  
ADMINISTRATIVE RECORD FILE INDEX  
02/28/2023  
REGION ID: 06  
SITE NAME: BULLDOG ENVIRONMENTAL SERVICES  
CERCLIS ID: TXN000622179  
SSID: A6TS

DOCID	DOC_DATE	PAGE_COUNT	TITLE	ACCESS_CODE	ADDRESSEE	AUTHOR	DOC_TYPE	Document Bates Begin	Document Bates End
100028446	04/06/2021	6	[REDACTED] TARGET SHEET FOR RESULTS OF SCREENING FOUR OF SIX DRUMS WITH THE FTIR/RAMAN AT THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Scott, Ricky (SCOTT MANUFACTURING INCORPORATED)	R06: Bernier, Roberto (U.S. ENVIRONMENTAL PROTECTION AGENCY)	EML / Email	000073	000073
100028375	05/13/2021	4	TCEQ INVESTIGATION REPORT FOR BULLDOG ENVIRONMENTAL SERVICES LLC SITE - INVESTIGATION NO. 1721972 - CONDUCTED ON 03/18/2021	UCTL(Uncontrolled)	R06: None (NONE SPECIFIED)	R06: Rhodes, Ryan (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY)	RPT / Report	000074	000077
100028383	05/13/2021	4	TCEQ INVESTIGATION REPORT FOR BULLDOG ENVIRONMENTAL SERVICES LLC SITE - INVESTIGATION NO. 1711446 - CONDUCTED ON 03/18/2021 -03/19/2021	UCTL(Uncontrolled)	R06: None (NONE SPECIFIED)	R06: Rhodes, Ryan (TEXAS COMMISSION ON ENVIRONMENTAL QUALITY)	RPT / Report	000078	000081
100028386	06/24/2021	3	CHRIS WATERS UNABLE TO PROVIDE A TIME FRAME FOR REMOVING THE REMAINDER OF THE DRUMS AT THE BULLDOG ENVIRONMENTAL SERVICES LLC SITE	UCTL(Uncontrolled)	R06: Mzee, Nabil (U.S. ENVIRONMENTAL PROTECTION AGENCY)	R06: Waters, Christopher (BULLDOG ENVIRONMENTAL SERVICES LLC)	EML / Email	000082	000084
100028395	11/05/2021	4	ATTACHMENT G - CONTAINER INVENTORY AND HAZARD DETERMINATION	UCTL(Uncontrolled)	R06: None (NONE SPECIFIED)	R06: None (NONE SPECIFIED)	LST / List/Index	000085	000088
100027779	06/02/2022	19	DOCUMENTATION OF A REMOVAL ACTION AND AFTER-ACTION REPORT AT THE BULLDOG ENVIRONMENTAL SERVICES SITE	UCTL(Uncontrolled)	R06: Carroll, Craig (U.S. ENVIRONMENTAL PROTECTION AGENCY)	R06: Mzee, Nabil (U.S. ENVIRONMENTAL PROTECTION AGENCY)	MEMO / Memorandum	000089	000107